

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

USA,

Plaintiff.

Vs

Maurice Mitchell

Defendant.

Case No.: 2:21-cr-00341-DCN-9

MOTION FOR ORDER REQUIRING
MEDICAL/SURGICAL ATTENTION
AND MOTION FOR BAIL TO ENABLE
THE FOREGOING

NOW COMES the Defendant by and through Counsel and **Moves** this Honorable Court as follows:

1. To Compel the United States and/or the Charleston County Sheriff's Office to render medical attention to the Defendant above named to at least address the Defendants medical needs.
 - A) Such surgery as is necessary to repair Hernia or hernias which are necessary due to prior surgical procedures failing all of which stem from being shot when the Defendant was 14 years of age.
 - B) To provide the Defendant with the security necessary for complete hospitalization and recovery and/or.
2. To Grant to the Defendant a reasonable Bond/Bail conditions of release and/or supervision for release so that the Defendant could obtain needed medical services on his own, AND
3. To Compel the United States of America and/or the County of Charleston to pay for such medical medical/surgical procedure if Defendant is detained and not released and **Further**, Ordered that the Cost expended by the government/County not be subordinated should the Defendant have a claim if the Defendant's medical condition is related to a failure of any previously utilized medical device.

AND IT IS SO MOVED this 12th day of November, 2021 at Charleston, South Carolina,

Respectfully submitted,

William L. Runyon, Jr

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